

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA**

TIFFANY LEWIS, on behalf of herself and  
others similarly situated,

Plaintiff,

v.

REGISTER.COM, INC.

Defendant.

Case No.: 1:25-cv-00275-JPH-MJD

Judge: Robert J. White

Magistrate Judge: Mark J. Dinsmore

**JOINT REPORT ON THE STATUS OF DISCOVERY**

Pursuant to this Court’s June 24, 2025 Order, ECF No. 29, Tiffany Lewis (“Plaintiff”) and Register.com, Inc. (“Defendant”) (jointly, the “Parties”) submit this Joint Report on the Status of Discovery.

**Joint Report on the Status of Discovery**

1. A detailed description of all discovery completed to date.
  - Following the 26(f) conference, the Plaintiff provided her First Set of Discovery to the Defendant on June 12, 2025.
  - The parties have both provided initial disclosures.
2. A detailed description of all discovery presently scheduled or pending, including the due dates for any pending discovery requests and the scheduled dates for any depositions, and the identity of the counsel responsible for completing such discovery.
  - The Plaintiff provided a 30-day extension for the Defendant to respond to the discovery requests served, and the responses are now due August 12. There are no depositions currently noticed.
  - Anthony Paronich, counsel for the Plaintiff, served the discovery outstanding and granted the extension request of Abbey Block, counsel for the Defendant.
3. A detailed description of any discovery disputes presently pending, including the status of the resolution of the dispute and the identity of the counsel responsible for resolving the dispute.

- The Parties have held numerous discussions, including one with the Court, where the Defendant indicated that it intended to file a motion to bifurcate discovery to focus on the merits of the individual claim only. The Plaintiff intends to oppose that motion, as previously indicated.
- Anthony Paronich, counsel for the Plaintiff, conducted that meet and confer and hearing before the Court with Abbey Block, counsel for the Defendant.

4. A detailed description of all discovery that is planned to be completed within the 28-day period following the report, including the identity of the counsel responsible for completing such discovery.

- Once the extended discovery responses are received, Anthony Paronich, counsel for the Plaintiff, intends to notice the deposition(s) of relevant individual(s) identified therein.
- Defendant intends to serve discovery requests, to include interrogatories, requests for admissions, and document production requests upon Plaintiff's counsel. Once discovery responses are received, counsel for Defendant intends to notice deposition(s) of relevant individuals identified therein.

5. A description of all known discovery remaining to be completed in this matter, including a proposed timetable for the completion of such discovery and the identity of the counsel responsible for completing such discovery.

- Aside from the items notated above, Plaintiff's future discovery efforts are likely to hinge on the document production and discovery responses received. However, that will certainly include a Fed. R. Civ. P. 30(b)(6) Notice and expert report related to identification of putative class members based on the Defendant's discovery responses and deposition.
- Aside from the items notated above, Defendant's future discovery efforts are likely to hinge on the document production and discovery responses received.

6. Any other discovery issues any party believes should be brought to the attention of the Court so as to avoid any further delays in the completion of discovery in this matter.

- Plaintiff has not identified any issues. As Plaintiff will explain in an opposition to any motion to bifurcate discovery, there is significant and substantial overlap between class certification and merits issues in TCPA cases, especially those that are focused on automated calls to individuals that had no relationship with the Defendant, like the Plaintiff here.

- Defendant's preparation of responses to Plaintiff's discovery requests has exacerbated Defendant's concerns regarding the volume and nature of information requested and the time and resources needed to respond to Plaintiff's requests (particularly with regard to the merits of the putative class action members' claims prior to the certification of the class). Defendant continues, in good faith, to prepare fulsome discovery responses, but intends to address these concerns in an anticipated motion for bifurcation of discovery.

Dated: July 25, 2025

/s/ Anthony I. Paronich

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*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 25th day of July 2025, I filed the foregoing with the Court's electronic filing system, which will automatically provide notice to all counsel of record.

Dated: July 25, 2025

/s/ A. Jeff Ifrah  
A. Jeff Ifrah